

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND**

In re CITY OF CENTRAL FALLS,  
RHODE ISLAND

Debtor

)  
) Case No. \_\_\_\_\_  
)  
)  
) Chapter 9  
)  
)  
)

**STATEMENT OF QUALIFICATIONS UNDER SECTION 109(c)**

The City of Central Falls (the “Debtor”), by and through Robert G. Flanders, Jr., in his capacity as Receiver of the City of Central Falls, submits this Statement of Qualifications under Section 109(c).

1. The Debtor is a municipality, as such term is defined in section 101 of the United States Bankruptcy Code;
2. The Debtor is specifically authorized in its capacity as a municipality or by name to be a debtor under chapter 9 by the laws of the State of Rhode Island, or by a governmental officer or organization empowered by the laws of the State of Rhode Island to authorize such entity to be a debtor under chapter 9. Specifically, the Receiver is authorized pursuant to R.I.G.L. § 45-9-7(b)(3): “[t]he power to file a petition in the name of the city or town under Chapter 9 of Title 11 of the United States Code, and to act on the city's or town's behalf in any such proceeding;”
3. The Debtor is insolvent;
4. The Debtor desires to effect a plan to adjust its debts;

5. The Debtor has (a) negotiated in good faith with creditors and has failed to obtain the agreement of creditors holding at least a majority in amount of the claims of each class that such entity intends to impair under a plan in its chapter 9 case; and/or (b) the Debtor is unable to negotiate with creditors because such negotiation is impracticable; and
6. This Statement of Qualifications under Section 109(c) is supported by a Memorandum of Law and Facts filed herewith.

**ROBERT G. FLANDERS, JR.**, in his capacity as  
Receiver of Central Falls,  
By his attorney,

/s/ Theodore Orson  
Theodore Orson, Esq. (No. 3874)  
Orson and Brusini Ltd.  
325 Angell Street  
Providence, RI 02906  
(401) 861-0344  
torson@orsonandbrusini.com

Dated: August 1, 2011

**DECLARATION UNDER PENALTY OF PERJURY**  
**ON BEHALF OF A MUNICIPALITY**

I, Robert G. Flanders, Jr., Receiver of the City of Central Falls, the authorized officer or an authorized agent of the municipality named as the debtor in this case, declare under penalty of perjury that I have read the foregoing Statement of Qualifications Under Section 109(c) and that it is true and correct to the best of my information and belief.

By: /s/ Robert G. Flanders, Jr.  
**ROBERT G. FLANDERS, JR.**,  
in his capacity as  
Receiver of the City of Central Falls  
Dated: August 1, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2011, I electronically filed the within with the Clerk of the Bankruptcy Court for the District of Rhode Island Using the CM/ECF System. The following participants have received notice electronically:

Gary L. Donahue ustpreion01.pr.ecf@usdoj.gov

/s/ Theodore Orson, Esq.